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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

REVIEW OF NONPOSTAL SERVICES	Docket No. MC2008-1 (Phase IIR)

UNITED STATES POSTAL SERVICE
INITIAL COMMENTS ON REMAND
(January 13, 2012)

In Order No. 392, the Commission ordered the termination, pursuant to 39 U.S.C. § 404(e), of commercial license agreements between the Postal Service and private sector producers of mailing and shipping products, including the agreement with LePage's. See Order No. 392 at 12-26. However, following appeals by LePage's and the Postal Service, that order was vacated and remanded by the United States Court of Appeals for the District of Columbia Circuit. See LePage's 2000, Inc. and LePage's Products, Inc. v. Postal Regulatory Comm'n, 642 F.3d 225 (D.C. Cir. 2011). In Order No. 1043, the Commission discussed the Court's decision, and requested comments on certain topics.

The Court's decision clearly indicates that both prongs of section 404(e)(3) require the Commission to focus on the "service" being offered by the Postal Service, which in this case is the act of licensing. Thus, it would not be proper for the Commission to predicate the application of Section 404(e) on the licensed products, considering the activity being performed by the Postal Service is fundamentally the same whether the product that results from a trademark license agreement is a teddy bear, a key chain, or an envelope. As such, the

most straightforward approach to resolving this docket is for the Commission to authorize the continuation of mailing and shipping licenses as nonpostal services for the same reasons that it authorized all other commercial licenses, and regulate them accordingly.

If the Commission decides to examine the product sold by the licensee, the facts, and the Court's decision, compel a conclusion that products currently or potentially sold through mailing and shipping licenses are "postal services" under the statutory definition of that term, and Commission precedent. As the Court noted, the products that are produced under these licenses are functionally indistinguishable from postal products. Furthermore, there is no basis in the language of the statute or Commission precedent to hold that licensed products cannot constitute "postal services" because they are not sold directly by the Postal Service to the end user.

Finally, if the Commission is determined to look at the individual licensed products under the rubric of Section 404(e), despite the clear direction of the Court's decision, there is no evidentiary or logical basis to conclude that the products sold pursuant to mailing and shipping licenses are inconsistent with that section, unlike the other commercial licenses. In particular, there is not an iota of evidence to support the Commission's determination that Postal Service-branded mailing and shipping products disrupt the market or cause customer confusion.

I. The Court's Decision Indicates that the Commission May Not Predicate the Application of Section 404(e) on the Products that Result from Licensing

A threshold issue raised by Order No. 1043 is whether the Commission can take into account the branded products manufactured pursuant to these licenses, including "their potential effect on the market" and their "purpose," under Section 404(e)(3). Order No. 1043 at 3-5. The Commission asserts that the Court's decision "addresses but does not resolve whether, in analyzing public need under 39 U.S.C. § 404(e)(3), the Commission may consider the products manufactured pursuant to the licensing agreement and their potential effect on the market." Id. at 4. It also requests comments on whether it may, as part of the private sector prong (39 U.S.C. § 404(e)(3)(B)), "take into account the purpose of the product manufactured pursuant to the licensing agreement." Id. at 5.

The Court clearly indicated that predicating the application of Section 404(e) on the products that result from licensing is not consistent with the plain language of the Act. The Court first noted that the inquiry under Section 404(e) must be on the service offered by the Postal Service, and further noted that "the service offered by the Postal Service in the Bubblewrap program is, of course, the licensing of intellectual property,"[1] rather than the licensed products themselves. 642 F.3d at 232. Because of this, the Court found, determining "public need" for commercial licensing by focusing "on the economic effect of the

[1] As the Commission notes, references to the "Bubblewrap program" in the Court's decision are to the mailing and shipping licenses within the commercial licensing program that are the subject of this proceeding. Order No. 1043 at 2 n.3.

products that result from licensing…would seem to depart from the Act's plain language." Id. (emphasis in original).

It may be true that—as the Commission notes (Order No. 1043 at 4)—the Court did not have issue a definitive ruling on this issue, because it found that the Commission's focus on the licensed products in determining public need in Phase II diverged without explanation from its approach in Phase I. 642 F.3d at 233 (noting that in Phase I the Commission assessed public need based on the service being offered by the Postal Service, licensing, "not the products resulting from that service"). But, this fact does not provide any basis for the Commission to consider the economic impact of the licensed products on remand, considering both the Court's clear indication as to the proper interpretation of Section 404(e)(3) when discussing the first prong of that section, and the Court's even plainer statement in a later passage in its decision, discussing the second prong. After first noting that the Commission's Phase II Order had also diverged from its Phase I approach in the application of the second prong, by changing the focus from licensing by the Postal Service to the licensed products themselves, id., the Court then stated:

> Nor, in fact, do we see how the Commission could adopt the position it does in its Phase II order. As we discussed – and as the Commission itself argues before us – under the Act, the Commission must assess the activity the [Postal] Service offers. In the case of commercial licensing – whether for mailing and shipping licenses or for other products – that activity is licensing. Therefore, for the Commission to review the private sector factor by assessing ability of the private sector to provide similar products *would bring the Commission into conflict not only with the Act*, but also with its (newly-minted) rationale for classifying commercial licensing a "nonpostal service."

Id. at 233-234 (emphasis added).

There is no basis to argue that the level of analysis differs between the two prongs of Section 404(e)(3). The first prong requires the Commission to consider the "public need for *the service*," and the second prong requires the Commission to consider "the ability of the private sector to meet the public need for *the service*." (emphases added). Thus, the Court's decision clearly indicates that focusing on the licensed products, rather than the act of licensing, "conflict[s]…with the Act" under either prong.

With the Court's admonition in mind, the application of Section 404(e)(3) to the licenses at issue here becomes a straightforward matter, because there is no basis in the record to distinguish these licenses from the rest of the commercial licensing program. Regarding the public need prong, all Postal Service licensing under the commercial licensing program clearly "generat[e] revenues" (in the form of royalties), and "promote[ ] and give[ ] recognition to [the Postal Service's] brand." Order No. 154 at 73. See also id. at 49 (noting that the Officially Licensed Retail Products (OLRP) program serves a public need because it "leverages the Postal Service's brand, advertises and enhances its image, and, through the revenues generated, helps support the Postal Service's core mission."). While the Commission has claimed that these benefits were "without sufficient evidentiary support" for mailing and shipping licenses, Order No. 392 at 14-15, the Court specifically faulted that conclusion, noting first that there was no distinction in the record between the benefits of commercial licensing as a general matter, and the mailing and shipping licenses, and also

that it did "not understand" how the benefits that led the Commission to approve OLRP "would not accrue to the Bubblewrap program, which aside from the seller's identity, is substantially similar to [OLRP]," 642 F.3d at 232. Furthermore, regarding the private sector prong, only the Postal Service has the ability to license its intellectual property, which the Court clearly found—in accord with the Commission's conclusion in Phase I—to be the determinative factor in applying that prong. Id. at 233-34.

In addition to its unsupported finding that the benefits of the mailing and shipping licenses were without evidentiary support, the Commission further found in Order No. 392 that other "factors" distinguished mailing and shipping licenses from other commercial licenses. Order No. 392 at 15. In particular, as the Court noted, "the Commission concluded that the Bubblewrap program *products* will cause customer confusion and will result in market disruption." 632 F.3d at 232 (emphasis in original). As this passage indicates, however, these factors that purportedly distinguish between Postal Service-branded mailing and shipping products and other types of products that result from the commercial licensing program impermissibly focus on the licensed *products* themselves, not the licensing of intellectual property by the Postal Service. Thus, the Commission may not permissibly distinguish between mailing and shipping licenses and other licenses based on purported concerns over the effect of the *products* on the marketplace. In addition, to answer the question posed by the Commission at page 5 of Order No. 1043, the Commission may also not consider, as part of the

private sector prong, any purported differences in the "purpose of the *product* manufactured pursuant to licensing agreement" (emphasis added).

II. If the Commission Determines that it Should Consider the Licensed Products, There is No Basis to Conclude that Licensing of Mailing and Shipping Products Is Not a "Postal Service"

If the Commission determines to use an analytical approach that examines the nature and effect of the product sold by the private party as a result of a licensing agreement, there is no basis for it to hold that Postal Service mailing and shipping licensing cannot constitute a "postal service." First, the Court clearly indicated that, analyzed at the product level, Postal Service-branded mailing and shipping supplies are "postal" for the same reasons that ReadyPost supplies and greeting cards are "postal." Second, there is no basis for the Commission's position, expressed before the Court, that licensing by the Postal Service cannot be a "postal service."

The purpose of Section 404(e) was to limit the Postal Service's authority regarding "services or products unrelated to [the Postal Service's] core business of providing postal services to the Nation." Order No. 154 at 16. See also U.S. Postal Serv. v. Postal Regulatory Comm'n, 599 F.3d 705, 706 (D.C. Cir. 2010) (noting that the Act was intended to restrict "ventures unrelated or only tangentially related to the delivery of mail"). That provision limits the Postal Service, with some exceptions not relevant here, to the provision of "postal services," which encompasses those services that "relate[ ] to…the carriage of mail," or that "serve[ ] 'other functions ancillary' to the carriage of mail." Order No. 154 at 30 (discussing 39 U.S.C. § 102(5)). Clearly, the mailing and shipping supplies sold by LePage's, and the mailing and shipping supplies that could be

licensed in the future through new mailing and shipping agreements, "relate" to, or serve "functions ancillary to," the carriage of mail.

The Court itself noted that mailing and shipping licenses involve "products related to the [Postal] Service's core business of delivering the mail." 632 F.3d at 226. It further held that, if the nature and use of the products is considered, any attempt to distinguish between the products sold through commercial mailing and shipping licenses, and those products approved as "postal services"—ReadyPost and greeting cards in particular—is "untenable." Id. at 231. As the Court found, these products "meet customers' mailing needs, make access to the mailstream easier, and, because they are available in many retail establishments, improve customer convenience." Id. at 231-32.

These findings directly undercut the Commission's statements in Order No. 392 as to why these licensed mailing and shipping products differ from ReadyPost supplies, see Order No. 392 at 16-18, such as the Commission's view that these products "will not add a notable degree of convenience for customers," id. at 17. In addition, the Commission indicated that licensed mailing and shipping products differ from ReadyPost because the latter is "designed to meet the public's *immediate* mailing needs." Id. (emphasis added). While the Commission is correct that ReadyPost supplies are generally used to immediately send something through the mail, this is not always true, and can never be true when those supplies are purchased through the internet. Furthermore, there is no reason why Postal Service-branded mailing and shipping supplies may not be used "immediately," particularly when they are

located next to an access point for inserting mailpieces into the mailstream. But, even if this were not the case, the relevant question under 39 U.S.C. § 102(5) is not whether the supplies meet the public's "immediate mailing needs," but whether it meets the public's "mailing needs" so that they can be said to "relate" to the carriage of mail. As the Court found, the Postal Service-branded products clearly satisfy that test.

It is also unreasonable for the Commission to argue that the products resulting from mailing and shipping licenses cannot be considered "postal services" because the Postal Service's involvement in those products is restricted to licensing. There is nothing in the statutory definition of "postal service" that supports such a view. As discussed above, the definition considers whether a particular service "relates to," or is otherwise supportive of (i.e., "ancillary to") the various functions involved in the carriage of mail, Order No. 154 at 30, and "assesse[s] whether the *products* at issue…could 'reasonably be viewed as ancillary to the carriage of mail.'" 632 F.3d at 231 (citing Order No. 154 at 33). This is a functional inquiry that looks to the purposes of the product being used by the customer, and does not change based on factors unrelated to the functional utility of the product, such as technical background details regarding the contractual allocation of liability between the Postal Service and the manufacturer of the product. To hold otherwise would be to preclude the Postal Service from taking prudent steps to allocate liability to the manufacturer in appropriate circumstances, else such technical contracting details prevent the underlying product from being considered a "postal service" despite its clear

relationship to the carriage of mail.[2] Nor does this functional inquiry differ based on precisely where the product is sold. In this regard, the Commission must avoid any reasoning in this docket that would preclude the Postal Service from expanding its presence to alternative retail channels, which is of critical importance to the Postal Service's ongoing viability.

Furthermore, Commission precedent indicates that a product can be a "postal service" even if the Postal Service's activity regarding the product is limited to licensing. Customized postage involves the Postal Service licensing a private sector party to provide a product related to the mail: the sale of valid postage indicia. Similarly, mailing and shipping licenses constitute the Postal Service licensing a private sector party to provide a product related to the mail: mailing and shipping supplies. In its brief to the Court, the Commission sought to distinguish the two by noting that postage payment constitutes a "core function of the Postal Service." Commission Brief at 47 (citing Order No. 154 at 36). Presumably, therefore, Postal Service licensing can be a "postal service" when the licensed product sold by the licensee allows the end customer to access a "core function." But, Postal Service-branded mailing and shipping supplies constitute no less a "core" business function than postage payment methods, both of which are "postal services." See Order No. 392 at 17. See also 632 F.3d at 231-32. Thus, there is no logical basis to treat the licensing of postage indicia sold by a private sector licensee as a "postal service," but not the licensing of mailing and shipping supplies sold by a private sector licensee.

[2] The Commission surely would not find a product sold by the Postal Service to be a "nonpostal service" simply because the Postal Service may indemnify itself or otherwise limit its liability as part of its agreement with the manufacturer of the product.

III. Order No. 392's Determinations that Postal Service-Branded Mailing and Shipping Products Distort the Market and Cause Customer Confusion Lack Any Substantial Basis

If the Commission impermissibly concludes that Section 404(e) contemplates an examination of the effects of the products that result from Postal Service mailing and shipping licenses, and declines to then consider that such licensing is a "postal service," there still remains no evidentiary or logical basis to conclude that Postal Service mailing and shipping licenses are impermissible under Section 404(e), whereas other licenses are. In particular, the Commission's assertions in Order No. 392 that Postal Service-branded mailing and shipping products distort the market and cause customer confusion lack any evidentiary or logical basis.

The Commission asserts that customers will inherently perceive Postal Service-branded mailing and shipping products as being superior to other mailing and shipping products because of the Postal Service's monopoly over the delivery of certain kinds of mail, such that those products unfairly compete with other brands unless they are in fact superior to those other brands. Order No. 392 at 20-23. However, there is absolutely no evidence that customers perceive the Postal Service as having a special expertise as to mailing and shipping *supplies*, as contrasted to the *delivery* of mail. While the Commission has sought to conflate the two, see id. at 23, Commission Brief at 28, there is a clear difference between delivering an envelope or a parcel, and the manufacture of the envelope and parcel itself.

The Commission presents no evidence that customers actually view Postal Service-branded mailing and shipping supplies as being uniquely suited to the mail, as compared to other well-known brands. For instance, the Commission presents no evidence that a customer would purchase a Postal Service-branded envelope over a Staples-branded envelope out of a belief that only the former is suitable to being sent through the mail. Nor does logic support the Commission's position that customers perceive Postal Service-branded products as being uniquely suited to the mail over other brands, given that their experience in using the mail will have demonstrated that any reputable provider of mailing supplies makes products suitable for mailing.

To be sure, the presence of the Postal Service brand provides assurance that the licensed products satisfy the Postal Service's standards for durability, legibility and quality, Order No. 392 at 20, but nothing in this message is misleading. All trademark licensing communicates to consumers that the licensed products satisfy the licensors' quality standards, because, as the Commission has noted, when the Postal Service licenses *any* product, it "has an affirmative duty to control the quality of the licensed goods." Order No. 154 at 72. However, it is an unsupportable leap to claim that this assurance causes customers to inherently regard other well-known brands as being inferior to the Postal Service brand for use in the mail.

The only record basis for the Commission's determination concerning consumer perceptions of Postal Service-branded products was a statement by Pitney Bowes' witness. But this statement—which discussed the postage meter

ink market—constituted mere self-serving speculation as to how customers may perceive Postal Service-branded products relative to other brands, without citation to any actual evidence that consumers have this view. Such speculation, ungrounded in fact or logic, does not constitute substantial evidence. See Safe Extensions v. F.A.A., 509 F3d. 593, 605 (D.C. Cir. 2007) (noting that "[a]n agency's unsupported assertion does not amount to substantial evidence") (citation omitted). The existence of the postal monopoly is simply not sufficient to support the Commission's finding that Postal Service-branded mailing and shipping products unfairly distort the market.[3] Rather, concerns about the market impact of these products boil down to the fact that they compete with other brands. But, as the Commission stressed, "competition *per se* is not objectionable." Order No. 392 at 22.

The Commission's reasoning not only lacks an evidentiary or logical basis, but is contradicted by its approval of the sale of mailing and shipping supplies containing Postal Service trademarks at postal retail locations, in the form of ReadyPost supplies. In approving the sale of ReadyPost products, the Commission deemed it advantageous that they "offer customers a degree of assurance that such products will meet the packaging and labeling requirements of the Postal Service." Order No. 154 at 33. The Commission did not indicate that this "degree of assurance" results in customers believing that ReadyPost products are uniquely suited for use in the mail over other reputable brands of mailing and shipping supplies, or require that the Postal Service demonstrate that

[3] This is especially true for those products that are unrelated to the postal monopoly, such as products related to the delivery of parcels.

ReadyPost products are superior to other products in the market. But, if the Commission's views concerning consumer perceptions of Postal Service-branded mailing and shipping supplies are correct, its concern over unfair competition would also logically apply to ReadyPost products. Although the sale of ReadyPost supplies was approved as a "postal service" rather than a "nonpostal service," the Commission before approving the sale of goods as a "postal service" does consider the effect on competition. In fact, in the very order in which the Commission approved the addition of ReadyPost supplies to the Mail Classification Schedule, it considered whether another proposed new "postal service"—the sale of greeting cards—presented unfair competition concerns. See Order No. 391 at 21-22. However, the Commission approved the ReadyPost product without intimating that those products might be viewed as unfairly competitive because they are Postal Service-branded.

This decision concerning ReadyPost supplies was clearly correct, and serves to highlight the fact that the Commission cannot provide a satisfactory explanation for its differential reasoning as to the market impact of similar products. The Commission has claimed that ReadyPost supplies "present none of the potential for consumer confusion that arises when private parties sell items under the Postal Service brand" because the Postal Service "is the seller" and therefore "cannot disclaim all warranties and liability in a licensing agreement." Commission Brief at 33-34 (citing Order No. 392 at 17). But, even if this were true—and the Commission does not state why the Postal Service could not indemnify itself even when it is the seller of a product—the Commission does not

explain how the contractual allocation of liability—of which consumers would be unaware when making purchase decisions—would have any impact on consumer perceptions regarding the relative superiority of Postal Service-branded products over other products. If, as the Commission believes, Postal Service-branded products unfairly distort the market, this problem would exist regardless of where the product is sold.[4]

The Commission's reasoning is further undercut by the evidence that does exist, or by the glaring lack of evidence as to any market distortion by Postal Service-branded products. If customers viewed Postal Service-branded products as being inherently superior to other products for mailing purposes, one would logically expect that unfair advantage to show up in the sales figures. But, the Commission has never asserted that these products possess a large market share, and LePage's has noted that its products comprise a small percentage of the relevant market. Furthermore, if these products were causing widespread confusion among customers, one would expect customers to have complained to the Postal Service. But, the record demonstrates that no such complaints have been made. Postal Service Response to POIR No. 1, Question 16. Pitney Bowes, the source of the only "evidence" relied on by the Commission regarding

[4] The Commission's attempt to distinguish between the supplies sold by the Postal Service, and the supplies sold by private parties under license, on the basis that the Postal Service does not "stand behind" the latter products in "any meaningful way," Commission Brief at 26, is also unfounded. As the Commission noted in Phase I, the Postal Service "play[s] an active role in managing its licensed products by, among other things, requiring licensees to obtain advance approval for Postal Service-branded products, imposing quality control standards, and policing product use and promotion." Order No. 154 at 72. The Commission has never claimed that the Postal Service fails to exercise this role with respect to mailing and shipping licenses. It is thus incorrect to say that the Postal Service does not meaningfully "stand behind" its licensed products. It is, furthermore, illogical for the Commission to assert that the Postal Service's authority to engage in any activity requires it to assume all liability, and never transfer such liability to the party with which it is doing business, even if that disregards prudent business practice.

the postage meter ink market, also admitted that it "has not experienced and is not aware" of any unfair competitive actions on the part of the Postal Service. Order No. 392 at 22. Other than Pitney Bowes, no other market participant has claimed that any mailing and shipping product is anticompetitive.[5]

Thus, the Commission's Order constitutes a remedy in search of a problem. This is impermissible: "[p]rofessing that an order ameliorates a real industry problem but then citing no evidence demonstrating that there is in fact an industry problem is not reasoned decisionmaking." National Fuel Gas Supply Corp. v. FERC, 468 F.3d 831, 843-44 (D.C. Cir. 2006). As in that case, the Commission here has provided "no evidence" that Postal Service-branded products constitute "a real problem." Furthermore, while the Court in that case did not absolutely foreclose the possibility that an agency can enact a rule to address a purely *theoretical* threat of market distortion, it made clear that any such effort requires that the theoretical threat be "readily apparent," id. at 840, and that the agency carefully explain how that clear threat, unsupported by any record of actual abuse, justifies a "costly prophylactic rule[ ]," id. at 844-845.

For the reasons discussed above, the Commission cannot do so here, without ignoring logic and the fact that the evidence that does exist demonstrates that its concerns regarding the real or potential market-distorting-effects of Postal Service-branded products are wholly illusory. See BellSouth

[5] Moreover, if manufacturers of unlicensed mailing and shipping products wish to claim that their products are suitable for shipment by U.S. Mail, they are free to do so. The fact that these manufacturers do not view such a statement as being necessary further demonstrates that customers recognize the suitability of all reputable brands for use in the mail, and therefore would not purchase a Postal Service-branded product on the mistaken belief that the product meets mailing standards that other, unlicensed products do not.

Telecommunications Inc. v. FCC, 469 F.3d 1052, 1060 (D.C. Cir. 2006) (finding that "the agencies' predictive judgment gives [it] no license to ignore the past when the past relates directly to the question at issue,"). It also cannot do so without contradicting its prior reasoning concerning other Postal Service-branded products. In sum, there is no basis for the Commission, if it disregards the Court's teachings as to the proper level of analysis under Section 404(e), to distinguish between mailing and shipping products, and other licensed products in the commercial licensing program, on the basis of the "factors" identified in Order No. 392.

In addition, even the Commission determines to look at the purported "purpose" of the licensed products, the Commission lacks a reasonable basis to distinguish, as it does in its Order (Order No. 1043 at 5), between so-called "promotional" and "commercial" licensed products. There is simply no evidentiary basis for the Commission's assertion that the Postal Service-branded mailing and shipping products have a different "purpose" than other types of Postal Service-branded products. Rather, the evidence shows that the Postal Service treats all licenses within the same "commercial licensing" program, and considers all such licenses as primarily intended to confer the "promotional" benefits of generating revenues and promoting and giving recognition to the Postal Service's brand. See 642 F.3d at 232 (noting that "the evidence the Commission relied on for the benefits of the commercial licensing program—a statement from the [Postal] Service's manager of licensing—did not distinguish between different types of commercial licensing."). Thus, licensing in the mailing

and shipping context primarily serve the same promotional purposes as all other commercial licenses.

As the Court also found, id., the Commission's attempt to distinguish between so-called "promotional" licenses and "commercial" licenses is also inconsistent with its precedent concerning OLRP, which includes items related to mailing and shipping. As noted above, the Commission approved OLRP on the basis that the program "leverages the Postal Service's brand, advertises and enhances its image," and "can serve to increase sales volume" by "keep[ing] the name of the Postal Service in the minds of potential customers." Order No. 154 at 49. Nowhere in that discussion was there any indication that the OLRP items related to the mailing and shipping have a different "purpose" than other OLRP items.

While the Commission has previously pointed out that OLRP involves the sale of licensed products by the Postal Service rather than private parties, there is no reason why this distinction makes any difference when determining the "purpose" of the products. If the sale of branded mailing and shipping products through postal retail channels serves a public need by "keeping the name of the Postal Service in the mind of potential customers," id., then the same is clearly true when such items are purchased at a non-postal retail location. Indeed, the sale of branded products at nonpostal retail locations confers *additional* promotional benefits by "increas[ing] the Postal Service's 'footprint'"—i.e., permitting its brand to penetrate markets beyond postal retail locations. Thuro Supplemental Statement at 4.

IV. Conclusion

For the foregoing reasons, the Postal Service submits that the Commission should approve the continuation of mailing and shipping licenses within the commercial licensing program.

Respectfully submitted,

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